



**ANTI-CORRUPTION AND
BRIBERY POLICY**

Overview

1. Introduction	3
2. Purpose	4
3. Scope of Application	4
4. Definitions	5
5. Prohibited Conduct	5
6. Conflict of Interest	6
6.1 No Competition with the Company	7
6.2 Hiring of family members	8
6.3 Contracting with Suppliers and Clients	8
7. Communications Channel	9
8. Disciplinary Regime	9

STATUS TABLE

Identifier	Origin	Classification	DATA PROTECTION ACT	Location
POL_REG-20191212	In house	Restricted		INTERNATIONAL
Authors:	ECIX			
Summary:	Legal documentation required from clients of the LOGISFASHION group			
Key words:	CONTRACT, PROVISION OF SERVICES, EXONERATION, INSURANCE, DATA PROCESSOR			

VERSION CONTROL TABLE

Date	Changes Made	Author of the Change
17/01/2020	CREATION OF THE PROCEDURE	COMPLIANCE

This document's content is the property of Logisfashion. The information contained herein should only be used for the purpose for which the document is supplied.
 This document and all its copies must be returned to Logisfashion upon request.
 It is not permitted to create any kind of reproduction, publication or disclosure in whole or in part without the express authorisation of the owner.



1. Introduction

Bribery and corruption are widespread market practices, so much so that they have become one of the main objectives to be addressed by governments, as well as global institutions, using measures and standards to limit their presence in the market.

Despite the actions of governments and institutions, society has the sensation that these practices are widespread in the business world, even justifying such practices if they carry an economic or business benefit.

Within the LOGISFASHION group, corporate integrity, together with transparency and legality, are fundamental pillars of the operation of our company which must be reflected in the activity of our employees and managers while a system is created for the prevention, detection and sanctioning of fraudulent acts.

Likewise, at LOGISFASHION we declare a full rejection of business practices that are illegal or contrary to the Company's internal regulations, applicable law or good practices in any form.



2. Purpose

The objective of this policy is to reaffirm the values and principles of LOGISFASHION in the fight against corruption, therefore these behaviours are prohibited by national and international regulations and differ from the principles and values of the Company.

Dishonourable or illegal actions may occur in the normal activities of the job, due to different motives, whether economic or a present or future commercial or company benefit, as a reward for the worker to act or not act against the obligations inherent to their position.

This policy seeks to lay out in detail and reaffirm the principles and values of the LOGISFASHION group, connecting these principles or values with certain behaviours that may constitute crimes or activities contrary to the Company's ethics and values.

That stipulated in this policy is intended to promote behaviour that is appropriate and in line with the values and corporate principles in the decision-making process of all employees of the Company, thus avoiding any damage that may be caused to the Company, either in the form of a sanction or loss of a good business reputation.



3. Scope of Application

This policy applies to all companies in the LOGISFASHION group, to all its employees, managers and directors, as well as to business partners and third parties that are connected to the Company.



4. Definitions

- **Influence Peddling:** influencing a public official or authority, taking advantage of any situation arising from one's personal relationship with them or with another public official or authority, in order to obtain a resolution which may directly or indirectly generate an economic benefit for oneself or for a third party.
- **Bribe:** an act towards an individual, either through the delivery of a sum of money, a gift or an offering of any kind to then obtain from that person some kind of consideration or treatment of favour that, without that initial gift, would not have been obtained.
- **Gifts or offerings:** direct or indirect delivery of anything of value, including cash, provision of a service, benefit or favour, of any kind, to a person or to their nearest family circle.
- **Facilitation payment:** payments, gifts or offerings made to a person (a public official or an employee of a private company) to obtain a favour, such as expediting an administrative procedure, obtaining a permit, a licence or a service, or preventing an abuse of power.



5. Prohibited Conduct

- Under no circumstances, in order to improperly obtain a contract, will we offer, receive, accept or solicit any unjustified benefit, payment or advantage of any kind.
- Under no circumstances shall we expect any public official or authority, whether national or international, to act illegally on behalf of any of the companies of the LOGISFASHION group or against a third party, offering them money or gifts of any kind.
- It is prohibited for us to reach an advantageous agreement or preferential treatment by the Administration or public employees through the offering and/or promising, either directly or through intermediaries,

of personal or financial favours (money, loans, monetary advantages, etc.).

- We do not in any way influence a public authority or official by taking advantage of a personal relationship with them or another public official in order to obtain a resolution that may directly or indirectly generate an economic benefit for any of the companies in the LOGISFASHION group.
- If we are aware of the criminal origin of goods, we are prohibited from acquiring, owning, using or transmitting them.
- It is prohibited to carry out any type of activity that could be considered a violation of the laws of the defence of competition, such as holding meetings or conversations which are intended to agree with other companies in the sector on control systems and the functioning of the market in which it operates.

We are prohibited from participating in sectoral talks or meetings, which aim to reach agreements on:

- i. The direct or indirect fixing of prices or other commercial or service conditions.
- ii. The limitation or control of production, distribution, technical development or investment.
- iii. The distribution of the market or sources of supply.
- iv. The application, in commercial or service relations, of unequal conditions for equivalent services that place some competitors at a disadvantaged situation compared to others.
- v. Subjecting the signing of contracts to the acceptance of additional benefits which, due to their nature or in accordance with commercial uses, are not related to the objective of such contracts.



6. Conflict of Interests

There will be considered to be a conflict of interest in all situations in which the legitimate interests of the Company collide, directly or indirectly, with the acting or interest of the subjects bound by the Code of Ethics, causing the latter to:

- (i) Participate in activities that compete, directly or indirectly, with the interests of any company of the LOGISFASHION group.

- (ii) Make decisions that have been influenced by economic interests or personal interests, family members or friends.

6.1 No competition with the company

Employees do not compete with LOGISFASHION or take any personal advantage of the business opportunities that may be presented to them during the course of their employment relationship.

Consequently, unless expressly authorised by the Board of Directors or, where appropriate, the Executive Committee, we cannot:

- (i) Directly or indirectly hold shares or holdings in directly competing companies of any company of the LOGISFASHION group¹.
- (ii) Hold positions or functions, whether directly or indirectly, in directly competing companies of any company of the LOGISFASHION group.
- (iii) Having linked persons² who hold direct or indirect holdings in the capital of a company considered to be a direct competing company of any company of the LOGISFASHION group.
- (iv) Perform, for themselves or for others, the same analogous or complementary genre of activity that constitutes the group's corporate object.

LOGISFASHION respects the participation of the obligated individuals in other financial or business activities, provided that:

1 For these purposes, direct competing companies of any company of the LOGISFASHION group¹ are considered to be those companies that provide logistics services for the fashion and footwear sector, as well as perfumes and cosmetics, understanding logistics services to be storage, inventory control, handling, ironing, finishing, checking, quality control and distribution.

2 For these purposes, the following shall be considered to be persons who are linked to the obligated individual:

- The spouse or persons with a similar relationship of affectivity (de facto or de jure couples).
- Ascendants, descendants and siblings.
- Relatives with which a first- and second-degree affinity ratio is maintained, either vertically or collaterally.

DEGREES OF KINSHIP AND AFFINITY				
1st Degree	Parents	In-laws	Children	Son-in-law/Daughter-in-law
2nd Degree	Grandparents	Siblings	Siblings-in-law	Grandchildren

- Likewise, a linked person will be considered to be any other family member who lives with the obligated person or who, in any other way, is financially dependent on them.

- (i) The undertaking of said activities does not conflict with the provisions of the Code of Ethics and this policy, as well as the obligations arising from the employment contract or collaboration agreement of the obligated individual with the Company.
- (ii) These are legal activities that do not enter into competition with or cause potential conflicts of interest with their responsibilities as obligated individuals of LOGISFASHION.

6.2 Hiring of Family Members

We may hire direct family members and employee partners as employees or consultants, provided they pass the selection process established by the company because of their qualifications, performance, competencies and experience, and provided that there is no direct employment dependency relationship between the employee and his family member or partner.

The hiring of family members is subject to the same principles that LOGISFASHION has for the other employees in terms of promotions, remuneration, type of contract, etc., all depending on the position held.

6.3 Contracting with Suppliers and Clients

We will avoid situations with suppliers or clients that involve or may involve a conflict between their personal interests and those of LOGISFASHION, needing to refrain from representing the Company or intervening in decision-making in which, directly or indirectly, we ourselves, or a related person, have a personal interest.

In any case, we must bring to the attention of the hierarchical superior the existence of such a conflict of interest, so that the measures deemed necessary can be taken.

For this purpose, a person who is linked to the obligated individual means:

- The spouse or persons with a similar relationship of affectivity.
- Ascendants, descendants and siblings.
- Relatives with which a first- and second-degree affinity ratio is maintained, either vertically or collaterally. This classification covers: in-laws and siblings-in-law.
- Likewise, a linked person will be considered to be any other family member who lives with the obligated person or who, in any other way, is financially dependent on them.



7. Communications Channel

In order to facilitate the broaching of doubts or communications, we must inform the Compliance Officer or Compliance Committee, the hierarchical superior, the legal or human resources department, about any activity or suspected conduct that is contrary to this policy or national or international regulations, as well as doubts about the lawfulness or unlawfulness of behaviour that we have noticed or may know about.

The communication may be made physically or through the following email address: canaletico@logisfashion.com or through the form published on the Logisfashion website, guaranteeing us confidentiality and impartiality in the facts communicated. For more information please review the document “**Complaint Channel**”.

Neither LOGISFASHION nor its employees shall retaliate against employees who, acting in good faith, have communicated irregular matters concerning what is embodied in this policy. Any retaliation shall be considered to be serious misconduct against the Code of Ethics and shall be subject to disciplinary action.



8. Disciplinary Regime

Once the facts reported or detected by the Compliance Committee have been confirmed and proven, depending on their magnitude and nature, the non-compliance or violation of the provisions of this LOGISFASHION policy and legislation may entail the application of a disciplinary measure that may consist of admonishments, warnings, even implying the end of the employment relationship or the collaborative relationship between LOGISFASHION and the infringing party.

In the case of offences that constitute a crime, LOGISFASHION shall report such conduct to the competent authorities.